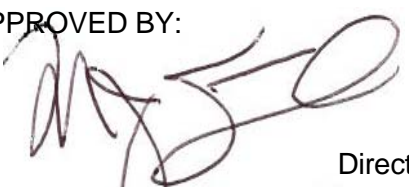




## DEPARTMENT OF MENTAL HEALTH POLICY/PROCEDURE

SUBJECT <b>COMPLIANCE TRAINING FOR LAC-DMH WORKFORCE</b>	POLICY NO. <b>106.10</b>	EFFECTIVE DATE <b>12/06/2012</b>	PAGE <b>1 of 3</b>
APPROVED BY:  Director	SUPERSEDES <b>112.16 12/06/2012</b>	ORIGINAL ISSUE DATE <b>07/31/2009</b>	DISTRIBUTION LEVEL <b>1</b>

### PURPOSE

- 1.1 To establish guidelines and requirements for the Los Angeles County-Department of Mental Health (LAC-DMH or Department) Compliance Program and Audit Services Bureau's (CPAS) compliance training program for the LAC-DMH workforce.

### DEFINITION

- 2.1 **LAC-DMH Workforce:** Employees (including management and supervisors), locum tenens, volunteers, interns, trainees, and other persons whose conduct in the performance of their work is under the direct control of LAC-DMH, whether or not they are paid by the County.
- 2.2 **Compliance Training:** Multifaceted education and training that focuses on the elements of a compliance program, and seeks to ensure that the workforce, including management, are knowledgeable and comply with pertinent federal, State, and County rules, regulations, statutes, policies, and procedures. Such training may also include areas of operation within LAC-DMH that may be high risk and potentially subject to audit exceptions.

### POLICY

- 3.1 CPAS shall develop and provide annual compliance training to the LAC-DMH workforce.
- 3.2 The LAC-DMH workforce shall complete the annual compliance training.
- 3.3 Training may be provided in classroom sessions, through the Learning Net, or email vignettes/trainings.
- 3.4 All new LAC-DMH workforce members obtain compliance training by attending the New Employee Training Program.



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SUBJECT	POLICY NO.	EFFECTIVE DATE	PAGE
<b>COMPLIANCE TRAINING FOR LAC-DMH WORKFORCE</b>	<b>106.10</b>	<b>12/06/2012</b>	<b>2 of 3</b>

- 3.5 Failure on the part of a LAC-DMH workforce member to participate in compliance training may result in disciplinary action or termination of employment. (See Reference 1)

### **PROCEDURES**

#### **4.1 Compliance Training:**

4.1.1 The LAC-DMH CPAS shall be responsible for developing, implementing, evaluating, and maintaining a compliance-training program for the Department.

4.1.2 Assistance may be obtained from the Human Resources Training Division, the Chief Information Officer's Bureau, or other available resources.

4.1.3 Compliance training shall:

- Include sign-in sheets for facilitated sessions or other means as in the case of tracking on-line training programs.
- Annually, the employees of LAC-DMH will be expected to attend a training presented by, or prepared by, CPAS. Training topics may include, but are not be limited to:
  - a) The elements of an effective compliance program.
  - b) The false claims act and non-retaliation provisions.
  - c) Appropriate behaviors in the work place.
  - d) How to report an alleged compliance violation.

4.2 CPAS may use surveys or testing to measure the effectiveness of the training sessions.

#### **4.3 Annual Training:**

4.3.1 LAC-DMH staff and managers shall complete annual compliance training and shall sign (manually or electronically) an attendance roster, or follow instructions provided with email training.



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SUBJECT	POLICY NO.	EFFECTIVE DATE	PAGE
<b>COMPLIANCE TRAINING FOR LAC-DMH WORKFORCE</b>	<b>106.10</b>	<b>12/06/2012</b>	<b>3 of 3</b>

4.3.2 Attendance may include the completion of pre-testing and post-testing functions.

#### 4.4 **Specific Technical Training:**

4.4.1 As necessary or relevant, CPAS will include in their training presentation various organizational units where additional training will reduce audit exceptions and/or risk to the Department.

4.4.2 Organizational units included in the compliance training will be required to develop their specialized or technical training. Such training materials shall be maintained in each respective organizational unit as reference guides and will serve to train new employees.

#### **REFERENCE**

1. DMH Policy No. 605.01, Discipline

#### **AUTHORITY**

1. Code of Federal Regulations, Title 42, Section 438.608, (b) (3)

#### **RESPONSIBLE PARTY**

The Office of the LAC-DMH Compliance Officer